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1	Christian Gabroy (#8805)
2	Kaine Messer
3	(#14240)   Gabroy Messer
4	The District at Green Valley Ranch 170 South Green Valley Parkway
	Suite 280
5	Henderson, Nevada 89012
_	Tel: (702) 259-7777
6	Fax: (702) 259-7704 christian@gabroy.com
7	kmesser@gabroy.com
8	Attorneys for Plaintiff Jacob Boucon
	1

## **UNITED STATES DISTRICT COURT** DISTRICT OF NEVADA

JACOB BOUCON, an individual

Plaintiff,

VS.

COLLEGE LOAN CORPORATION, a Nevada Corporation; DOES I through X; and ROE Corporations XI through XX, inclusive.

Defendant.

Case No: 2:24-cv-01405-RFB-MDC

STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE PLAINTIFF'S RESPONSE TO **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** 

(First Request)

## STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

It is hereby stipulated by and between Plaintiff Jacob Boucon ("Plaintiff" or "Boucon") and Defendant College Loan Corporation ("Defendant") by and through their respective attorneys of record, that Plaintiff shall have an extension up to and including July 9, 2025, for Plaintiff to file his Response to Defendant's Motion for Summary Judgment. This stipulation is submitted per LR IA 6-1. Defendant filed its Motion for Summary Judgment on May 28, 2025 and Plaintiff's Response is currently due on June 18, 2025. See ECF No. 18. This is the first request for an extension to file Plaintiff's Response to Defendant's Motion for Summary Judgment.

This request is based upon the following:

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	1.	Defendant filed its Motion for Summary Judgment on May 28, 2025.	EC
Nο	18		

- 2. Plaintiff's responsive pleading is currently due June 18, 2025.
- 3. This is the first request for an extension of time for the Plaintiff to file his responsive pleading.
- 4. This request for extension is made in good faith and good cause supports the request.
- 5. Plaintiff currently is tending to four upcoming mediations, one conciliation, and a hearing on a motion for summary judgment in a wrongful death matter. Additionally, Plaintiff's counsel was recently out of the office due to a health issue and has experienced personnel transition.
- 6. Plaintiff has requested this extension and Defendant has graciously accepted.
- 7. Therefore, the parties agree that the deadline to file Plaintiff's Response to Defendant's Motion for Summary Judgment shall be extended from June 18, 2025 to July 9, 2025.

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3	Dated this 17th day of June 2025.
4	GABROY   MESSER
5	By: /s/ Christian Gabroy
6	Christian Gabroy (#8805)
7	Kaine Messer (#14240)
8	The District at Green Valley Ranch 170 South Green Valley Parkway
9	Suite 280   Henderson, NV 89012
10	christian@gabroy.com kmesser@gabroy.com
11	Attorneys for Plaintiff
12	IT IS SO ORDERED.

faith and not for purposes of delay.

Dated this 17th day of June 2025.

FENNEMORE CRAIG, P.C.

By: /s/ Shannon S. Pierce
Shannon S. Pierce
(#12471)
7800 Rancharrah Parkway
Reno, NV 89511
spierce@fennemorelaw.com
Attorney for Defendant

No party is prejudiced by this request and this request is made in good

**DATED** this 18th day of June, 2025.

RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE